

Exhibit A

Stevenson, Lee Ann

From: Stevenson, Lee Ann
Sent: Monday, January 21, 2013 9:40 AM
To: Chris Lopalo
Subject: Following Up

Chris:

As discussed at last week's conference, plaintiffs will go forward with the two scheduled depositions of Verizon fact-witnesses Perfetto and Veltri, and then after the completion of those depositions we will meet-and-confer and discuss whether you believe any additional Verizon depositions are necessary. If any additional depositions are taken after February 28 (ie during "Phase II"), we will not preclude plaintiffs from relying on the testimony during any "Phase I" trial.

REDACTED

Thanks

LAS

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